

# EXHIBIT "A"

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, e-mail, bar number, and address): AMANDA UHRHAMMER/SBN 199075 MASTAGNI, HOLSTEDT, AMICK, MILLER, JOHNSEN & UHRHAMMER A Professional Corporation 1912 I Street Sacramento, CA 95814 TELEPHONE NO.: (916) 446-4692 FAX NO. (Optional): (916) 447-4614 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): PLAINTIFF SFDSA		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister Street MAILING ADDRESS: CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME:		
PLAINTIFF/PETITIONER: SAN FRANCISCO DEPUTY SHERIFF'S ASSOCIATION; et al. DEFENDANT/RESPONDENT: CITY AND COUNTY OF SAN FRANCISCO OFFICE OF THE SHERIFF, et al.		
<b>CASE MANAGEMENT STATEMENT</b> (Check one): <input checked="" type="checkbox"/> <b>UNLIMITED CASE</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>LIMITED CASE</b> (Amount demanded is \$25,000 or less)		
		CASE NUMBER: CPF -07-507-047 COURTCALL

A CASE MANAGEMENT CONFERENCE is scheduled as follows:

Date: October 12, 2007 Time: 9:00a Dept.: 212 Div.: Room:

Address of court (if different from the address above):

**INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.**

- Party or parties (answer one):**
  - ☒ This statement is submitted by party (name): Plaintiff SFDSA
  - ☐ This statement is submitted jointly by parties (names):
- Complaint and cross-complaint (to be answered by plaintiffs and cross-complainants only)**
  - The complaint was filed on (date): February 20, 2007; Amended filed March 15, 2007
  - ☐ The cross-complaint, if any, was filed on (date):
- Service (to be answered by plaintiffs and cross-complainants only)**
  - ☒ All parties named in the complaint and cross-complaint have been served, or have appeared, or have been dismissed.
  - ☐ The following parties named in the complaint or cross-complaint
    - ☐ have not been served (specify names and explain why not):
    - ☐ have been served but have not appeared and have not been dismissed (specify names):
    - ☐ have had a default entered against them (specify names):
  - ☐ The following additional parties may be added (specify names, nature of involvement in case, and the date by which they may be served):
- Description of case**
  - Type of case in ☒ complaint ☐ cross-complaint (describe, including causes of action):  
 Class Action Complaint for Damages, Discrimination Based on Gender, Injunctive Relief.

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4. b. Provide a brief statement of the case, including any damages. (If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)
- Defendants instituted a policy and practice of only using female deputies in female pods of county Jail No. 8. Defendants also instituted a policy and practice that created a two-tiered gender based system for determination of regular days off. This practice discriminated against both male and female deputies working in the jail. Plaintiffs' damages include but are not limited to compensatory damages, general damages, punitive damages, lost past, present and future wages, injunctive relief, statutory attorney's fees and costs. A motion for joinder will be filed to add additional representative plaintiffs.

☐ (If more space is needed, check this box and attach a page designated as Attachment 4b.)

5. Jury or nonjury trial

The party or parties request ☒ a jury trial ☐ a nonjury trial (if more than one party, provide the name of each party requesting a jury trial):

6. Trial date

- a. ☐ The trial has been set for (date):
- b. ☒ No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint (if not, explain): This is a proposed class action and will take additional time for discovery and pre and post certification proceedings.
- c. Dates on which parties or attorneys will not be available for trial (specify dates and explain reasons for unavailability):

7. Estimated length of trial

The party or parties estimate that the trial will take (check one):

- a. ☒ days (specify number): 20-30 court days
- b. ☐ hours (short causes) (specify):

8. Trial representation (to be answered for each party)

The party or parties will be represented at trial ☒ by the attorney or party listed in the caption ☐ by the following:

- a. Attorney: Amanda Uhrhammer and David P. Mastagni
- b. Firm: Mastagni, Holstedt, Amick, Miller, Johnsen & Uhrhammer
- c. Address: 1912 I Street
- d. Telephone number: (916) 446-4692
- e. Fax number: (916) 447-4614
- f. E-mail address: amanda@mastagni.com
- g. Party represented: Plaintiff SFDSA

☐ Additional representation is described in Attachment 8.

9. Preference

☐ This case is entitled to preference (specify code section):

10. Alternative Dispute Resolution (ADR)

- a. Counsel ☒ has ☐ has not provided the ADR information package identified in rule 3.221 to the client and has reviewed ADR options with the client.
- b. ☐ All parties have agreed to a form of ADR. ADR will be completed by (date):
- c. ☐ The case has gone to an ADR process (indicate status):

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## 10. d. The party or parties are willing to participate in (check all that apply):

- (1) ☐ Mediation
- (2) ☐ Nonbinding judicial arbitration under Code of Civil Procedure section 1141.12 (discovery to close 15 days before arbitration under Cal. Rules of Court, rule 3.822)
- (3) ☐ Nonbinding judicial arbitration under Code of Civil Procedure section 1141.12 (discovery to remain open until 30 days before trial; order required under Cal. Rules of Court, rule 3.822)
- (4) ☐ Binding judicial arbitration
- (5) ☐ Binding private arbitration
- (6) ☐ Neutral case evaluation
- (7) ☐ Other (specify):

e. ☐ This matter is subject to mandatory judicial arbitration because the amount in controversy does not exceed the statutory limit.

f. ☐ Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.

g. ☒ This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court (specify exemption):  
Exceeds jurisdictional limits and not suitable for arbitration. Injunctive relief sought. Case is a class action

## 11. Settlement conference

☐ The party or parties are willing to participate in an early settlement conference (specify when): The parties agree that this would not be useful at this time.

## 12. Insurance

- a. ☐ Insurance carrier, if any, for party filing this statement (name):
- b. Reservation of rights: ☐ Yes ☐ No
- c. ☐ Coverage issues will significantly affect resolution of this case (explain):

## 13. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case, and describe the status.

☐ Bankruptcy ☐ Other (specify):

Status:

## 14. Related cases, consolidation, and coordination

- a. ☒ There are companion, underlying, or related cases.
- (1) Name of case: Ambat, et al. v. City and County of San Francisco, et al.
- (2) Name of court: US District Court, Northern District
- (3) Case number: C07-3622
- (4) Status: Pending-Motion to Dismiss set for 10/19/07
- ☐ Additional cases are described in Attachment 14a.
- b. ☐ A motion to ☐ consolidate ☐ coordinate will be filed by (name party):

## 15. Bifurcation

☐ The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (specify moving party, type of motion, and reasons):

## 16. Other motions

☒ The party or parties expect to file the following motions before trial (specify moving party, type of motion, and issues):  
Class certification motions, motions to join additional plaintiffs, motions in limine. Plaintiffs anticipate Defendants will file Motions for Summary Judgment/Adjudication.

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**17. Discovery**

- a. ☐ The party or parties have completed all discovery.
- b. ☒ The following discovery will be completed by the date specified (*describe all anticipated discovery*):

<u>Party</u>	<u>Description</u>	<u>Date</u>
Plaintiff SFDSA	Written Discovery-Interrogatories, RFA, Requests for Document Prod.	no sooner than 12/08
Plaintiff SFDSA	Depositions	no sooner than 12/08
Plaintiff SFDSA	Expert Discovery	no sooner than 6/2009

- c. ☒ The following discovery issues are anticipated (*specify*): Class Discovery

**18. Economic Litigation**

- a. ☐ This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90 through 98 will apply to this case.
- b. ☐ This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (*if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case*):

**19. Other issues**

- ☒ The party or parties request that the following additional matters be considered or determined at the case management conference (*specify*): The individual plaintiffs dismissed this action after they filed a separate action in federal court-A Motion for Joinder by approximately 16 additional representative plaintiffs will be filed before this conference.

**20. Meet and confer**

- a. ☒ The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (*if not, explain*): Counsel for Plaintiff SFDSA and the City and County of San Francisco have met and conferred on August 14, 2007 and September 17, 2007. Dismissal of the individual plaintiffs was received September 17, 2007.
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (*specify*): We agree that ADR would not be useful at this time.

**21. Case management orders**

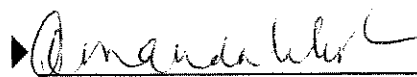
Previous case management orders in this case are (*check one*): ☐ none ☐ attached as Attachment 21.

22. Total number of pages attached (*if any*): -0-

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and ADR, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: September 17, 2007

AMANDA UHRHAMMER (SBN 199445)  
(TYPE OR PRINT NAME)

  
(SIGNATURE OF PARTY OR ATTORNEY)

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY)

☐ Additional signatures are attached

**PROOF OF SERVICE (C.C.P. §1013a)**

SHORT TITLE OF CASE: *San Francisco Deputy Sheriffs' Association v. City and County of San Francisco, et al.*  
 COURT NAME: San Francisco County Superior Court  
 CASE NUMBER: CPF07507047

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and not a party to the above-entitled action; my business address is 1912 I Street, Sacramento, California 95814.

On the date below, I served the following document(s):

**Case Management Conference Statement [October 12, 2007]**

addressed as follows:

**Dennis J. Herrera, City Attorney**  
**Jill J. Figg, Deputy City Attorney**  
**Rafal Ofierski, Deputy City Attorney**  
**1390 Market Street, Fifth Floor**  
**San Francisco, California 94102-5408**  
**Telephone: (415) 554-3971**  
**Facsimile: (415) 554-4248**  
**Direct Dial [figg] (415) 554-3971**  
**Email: [jill.figg@sfgov.org](mailto:jill.figg@sfgov.org)**

**Attorneys for Defendants**

**Lawrence D. Murray**  
**MURRAY & ASSOCIATES**  
**1781 Union Street**  
**San Francisco, CA 94123**  
**Telephone: (415) 673-0555**  
**Facsimile: (415) 928-4084**

**Attorneys for Plaintiffs, DENNIS CARTER, MICHAEL JONES, ALISA ZEHNER, JOANNA CROTTY, VINCENT QUOCK, TEQUISHA CURLEY and ANJIE VERSHER [Courtesy Copy]**

  X   **BY MAIL.** I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the United States Mail on the same day with postage thereon fully prepaid at Sacramento, California, in the ordinary course of business.

       **BY CERTIFIED MAIL.** I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at Sacramento, California, in the ordinary course of business.

       **BY PERSONAL SERVICE.** I caused such envelope to be delivered by hand to the offices of the person(s) listed above.



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COURT NAME: San Francisco County Superior Court  
CASE NUMBER: CPF07507047

\_\_\_\_\_ **BY FACSIMILE TRANSMISSION.** I transmitted such document(s) by facsimile machine to the telephone number listed above.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on **September 18, 2007**, at Sacramento, California.

mento, California.

Mary Therese Tullo  
Mary Therese Tullo

